



**MEMORANDUM ENDORSED**

January 16, 2020

**Via ECF**

Honorable Gregory H. Woods  
United States District Judge  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street – Courtroom 12C  
New York, New York 10007-1312

Re: Namel Norris v. Mobile City NY 1 LLC  
and Tsoumpas Sisters Inc.  
United States District Court  
Southern District of New York  
Case No. 19-cv-03069 (GHW)

Honorable Judge Woods:

This firm represents Defendant Tsoumpas Sisters Inc. (“Tsoumpas”) in the above-referenced matter. We are writing this joint letter on behalf of Tsoumpas and Mobile City NY 1 LLC (“Mobile”) (collectively “Defendants”) with the consent of Mobile’s counsel, respectfully to request an extension of time for Defendants to answer, move or otherwise respond to the Complaint from January 17, 2020, through and including February 28, 2020, and to adjourn the Initial Pretrial Conference (the “Conference”) from January 30, 2020, at 3:00 p.m., until after February 28, 2020.

This is Defendants’ fourth request to extend the time to answer and to adjourn the Conference and is with the consent of Plaintiff’s counsel, although Plaintiff’s counsel was granted two (2) adjournments of the Conference [ECF #11 and ECF #13]. The Defendants’ first request to extend the time to answer and to adjourn the Conference was by letter motion dated and filed September 16, 2019 [ECF #’s 17 and 18, respectively], which the Court granted by Memo Order dated and filed September 17, 2019 [ECF #19]. The Defendants’ second request to extend the time to answer and to adjourn the Conference was by letter motion dated and filed October 16, 2019 [ECF #’s 20 and 21, respectively], which the



Honorable Gregory H. Woods  
United States Magistrate Judge  
January 16, 2020  
Page 2 of 2

Court granted by Memo Order dated October 18, 2019, and filed October 21, 2019 [ECF #22]. The Defendants' third request to extend the time to answer and to adjourn the Conference was by letter motion dated and filed November 22, 2019 [ECF #'s 23 and 24, respectively], which the Court granted by Memo Order dated November 25, 2019, and filed November 26, 2019 [ECF #25], as modified by the Court's Order dated and filed January 14, 2020 [ECF #26].

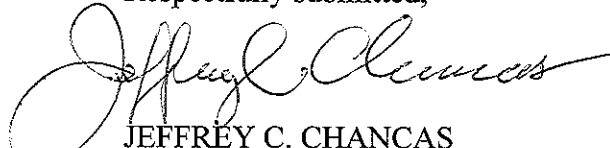
While the Court in its November 25, 2019 Order stated that, "the parties should not expect further extensions of time," we respectfully request that the Court grant the extension of time to answer the Complaint and the adjournment of the Conference, based upon the current status. The architect for Tsoumpas, the landlord of the subject premises, is already in the process of preparing the requisite drawings and documents regarding the construction of a ramp for the premises. Plaintiff's counsel and I have been discussing a settlement regarding any alleged damages and legal fees. In addition, Mobile's lease for the premises expires in April 2020. It has not yet been determined whether the lease will be renewed, which will affect numerous aspects of any settlement, including but not limited to any internal remediation of the premises. All the parties are interested on focusing on the settlement and minimizing the litigation costs, to the extent that the Court will allow that for a bit longer.

This request is with the consent of Plaintiff's counsel and does not interfere with any other scheduled dates.

Wherefore, I respectfully request that the Court grant the extension of time for Defendants to file their answers to the Complaint until February 28, 2020, and the adjournment of the Conference until after February 28, 2020.

Thank you.

Respectfully submitted,



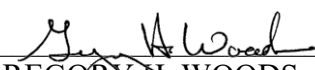
JEFFREY C. CHANCAS

Application granted. The deadline for Defendants to answer or otherwise respond to the complaint is extended until February 28, 2020. The initial pretrial conference scheduled for January 30, 2020 is adjourned to March 9, 2020 at 4 p.m. The joint letter and proposed case management plan described in the Court's April 15, 2019 Order, Dkt No. 7, are due no later than March 2, 2020.

The Clerk of Court is directed to terminate the motions pending at Dkt Nos. 27 and 28.

SO ORDERED.

Dated: January 17, 2020  
New York, New York



GREGORY H. WOODS  
United States District Judge